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Attorneys for Real Party in Interest
PATIENTS MUTUAL ASSISTANCE
COLLECTIVE CORPORATION,
dba HARBORSIDE HEALTH CENTER

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CITY OF OAKLAND

Plaintiff,

v.

ERIC HOLDER, Attorney General of the
United States; and MELINDA HAAG, U.S.
Attorney for the Northern District of
California,

Defendants.

No. CV 12-5245 MEJ

**PATIENTS MUTUAL ASSISTANCE
COLLECTIVE CORPORATION DBA
HARBORSIDE HEALTH CENTER'S
JOINDER IN CITY OF OAKLAND'S
MOTION FOR STAY**

Patients Mutual Assistance Collective Corporation dba Harborside Health Center
("Harborside"), as a party claimant in case nos. CV 12-3566 MEJ and CV 12-3567 MEJ (the
related cases subject of the motion to stay), and as real-party-in-interest in the above-captioned
case, hereby joins in the City of Oakland's Motion to Stay Landlords' "Motions for Order
Prohibiting Unlawful Use of Defendant Property", filed on November 27, 2012.

Harborside concurs in the entirety of the Memorandum of Points and Authorities filed in

1 support of City of Oakland's motion, and concurs particularly in the statement that "through Ms.
 2 Chretien's motion, the government is attempting to do through the back door, *i.e.*, immediately
 3 shutter Harborside, what it is unable to do directly through its illegal forfeiture action." (City of
 4 Oakland Motion, 2:10-12.) Staying the motions of Ms. Chretien and of Concourse Business
 5 Center will preserve the status quo, will enable Harborside, the City of Oakland, and all parties to
 6 present their cases in an orderly, non-prejudicial manner, and will avoid multiple briefings of the
 7 same or similar issues, with the possibility of inconsistent results. On the other hand, the rights of
 8 the City of Oakland, of Harborside, and of Harborside's patients will be substantially harmed in
 9 the absence of a stay.
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 12 Dated: November 29, 2012

HENRY G. WYKOWSKI & ASSOCIATES

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 15 By: /s/ Henry G. Wykowski
 16 HENRY G. WYKOWSKI
 17 Attorneys for Real Party in Interest
 18 PATIENTS MUTUAL ASSISTANCE
 19 COLLECTIVE dba HARBORSIDE
 20 HEALTH CENTER
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CERTIFICATE OF SERVICE

I certify that copies of the above document was served electronically on November 29, 2012 on counsel of record in compliance with Federal Rule of Civil Procedure 5 and the local rules of the Northern District, by use of the Court's ECF system.

/s/ Henry G. Wykowski

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